

# BakerHostetler

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May 20, 2021

### VIA E-MAIL

Hon. J. Paul Oetken  
United States District Court  
Southern District of New York  
Thurgood Marshall  
40 Foley Square  
New York, NY 10007

*Re: Ex Parte Application of Diligence Global Business Intelligence SA, pursuant to 28 U.S.C. § 1782 to Conduct Discovery for Use in Foreign Proceedings, Index No. 21-mc-00401*

Dear Judge Oetken:

We write on behalf of applicant Diligence Global Business Intelligence SA (“DGBI”) in the above referenced matter. On April 19, 2021, DGBI filed an application pursuant to 28 U.S.C. § 1782 seeking an order granting DGBI leave to serve Michael Holtzman with a subpoena submitted therewith (the “Application”).

DGBI respectfully submits a corrected Memorandum of Law in Support of the Application. The Corrected Memorandum of Law makes the following revision on page 6:

**Original:** The 2019 New York Times article detailing Mr. Holtzman’s possible role in Cornerstone’s and Mr. Nuseibeh’s alleged corruption and money laundering in connection with the 2022 World Cup in Qatar demonstrates that Mr. Holtzman has information relevant to the Geneva Action, and DBSI’s potential defense in a possible English action.

**Revised:** The facts relating to Mr. Holtzman, Mr. Nuseibeh, and Cornerstone alleged in the 2019 New York Times article are clearly relevant to DGBI’s investigation of allegations of corruption relating to the 2022 World Cup in Qatar and therefore to DGBI’s potential defense in any possible English action as well as its request for declaratory relief before the Swiss courts.

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We appreciate Your Honor's attention to this matter.

Respectfully submitted,

*/s/ Gonzalo S. Zeballos*

Gonzalo S. Zeballos